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INTEROFFICE CORRESPONDENCE

DATE February 19, 1990
TO P W Edrich
FROM M E Levin *ME*
SUBJECT COMMENTS ON RESUMPTION ASSESSMENT CRITERIA

CWA-MEL-152-90

Attached is a markup of the NPDES compliance plan for the resumption

My primary comment is that all occurrences of "process liquids" should be replaced with the phrase "radioactive or chemically contaminated materials" since we are concerned with preventing all inappropriate (radioactive, hazardous, toxic, etc) substances from entering the sanitary waste system, as opposed to merely inappropriate liquids

Further discussion relates to the appropriate location issue

- Criteria 1 Sanitary drains or receptacles connected to sanitary drains which could be contaminated with radioactive or chemically contaminated materials in dust or other form during a credible accident scenario or normal operations are not appropriate
- Criteria 4 Due to the high rate of human failure in comparison to the failure rates of mechanical subsystems and the historically high human failure rate at Rocky Flats Plant, the mere labeling of sanitary drains is not an adequate measure to prevent inadvertent ingress of radioactive or chemically contaminated materials into the sanitary waste system. We cannot accept a situation where a single human failure to observe administrative controls results in release to the environment

Thus, the key to appropriate location is the concept of multiple failures with a low cumulative probability being necessary for a release to occur. As general guidance, no sanitary drains should be located in areas where radioactive materials or hazardous or toxic chemicals are used or stored, nor should sanitary drains be located in areas where a credible pathway from areas of such storage or use exists. In cases of uncertainty the situation should be carefully investigated using safety analysis methodology and the results documented, no sanitary drain connection is appropriate if there is a credible scenario which results in a release (Per DOE Order 6430 1A, "credible" is defined as 10^{-6} /yr probability)

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ADMIN RECORD

cc
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